

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **1114 Fremont Avenue**
4 **South Pasadena, CA 91030**

5 **Tel: 626-799-9797**
6 **Fax: 626-799-9795**
7 **TPRLA@att.net**

8 **Attorneys for Plaintiffs**
9 **J & J Sports Productions, Inc.**

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **J & J Sports Productions, Inc.**

13 **Plaintiff,**

14 **vs.**

15 **Cornelia Czornei Palladini, et al.**

16 **Defendant.**

CASE NO. C08-00317-JF

PLAINTIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE; AND ORDER
(Proposed) WITH CORRECTED
PROOF OF SERVICE

17
18 Plaintiff J & J Sports Productions, Inc., hereby applies *ex parte* for an order continuing the initial
19 Case Management Conference in this action, presently set for Thursday, May 16, 2008 at 10:30 a.m. to a
20 new date approximately thirty (30) to forty-five (45) days forward. This request is necessitated by the
21 fact that Plaintiff has not yet perfected service of process as to the defendants named to this action.

22 As such, as of this writing, Plaintiff has yet to receive an answer or any other responsive
23 pleading from either of the defendants. As a result, Plaintiff's counsel has not conferred with the
24 defendants concerning the claims, discovery, settlement, ADR or any of the other pertinent issues
25 involving the case itself or the preparation of a Case Management Conference Statement.

26 ///

27 ///

28
PLAINTIFF'S *EX PARTE* APPLICATION FOR AN ORDER CONTINUING
CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed)
WITH CORRECTED PROOF OF SERVICE
CASE NO. C08-00317-JF
PAGE 1

ORDER (Proposed)

It is hereby ordered that the Case Management Conference in civil action number C08-00317-JF styled *J& J Sports Productions, Inc. v Cornelia Czornei Palladini, et al.*, is hereby continued from 10:30 a.m., Thursday, May 16, 2008, to _____.

The Parties shall file a joint Case Management Statement in advance of the Case Management Conference pursuant to the Local Rules and the Standing Order of this Court.

Plaintiff shall also serve a copy of this Order on the Defendants and thereafter file a Certification of Service of this Order with the Clerk of the Court.

IT IS SO ORDERED:

Dated: _____

THE HONORABLE JEREMY FOGEL
United States District Court
Northern District of California

///

///

///

///

///

///

///

///

///

///

///

CORRECTED PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On, May 9, 2008, I served:

PLAINTIFF'S *EX PARTE* APPLICATION FOR AN ORDER CONTINUING CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed)

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Cornelia Czornei Palladini (Defendant)
38 N. Main Street
Milpitas, CA 95035

Frank Oliver Palladini (Defendant)
38 N. Main Street
Milpitas, CA 95035

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct, and that this declaration was executed on May 9, 2008, at South Pasadena, California.

Dated: May 9, 2008

/s/ Terry Houston
TERRY HOUSTON